



May 9, 2011

Via Hand Delivery

Mr. Lewis Pulley
Assistant Chief, Policy Division
Media Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Mr. Pulley:

This letter, together with attached Exhibits 1 through 28,¹ serves as the response by WBAL Hearst Television Inc. (the "TV Licensee"), licensee of WBAL-TV, Baltimore, Maryland, to the Media Bureau's March 29, 2011, request for audit data relating to the station's EEO program. WBAL-TV together with co-owned radio stations WBAL(AM) and WIYY(FM), Baltimore, Maryland, licensed to Hearst Stations Inc. (the "Radio Licensee"), comprise the Employment Unit that is the subject of this audit.

The responses to the relevant audit data requests are set forth below, and the required documentation is provided in the attached Exhibits.

Audit Data Request 3(a). Copies of the Unit's two most recent EEO public file reports, described in Section 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit's most recent EEO public file report is not included on or linked to on each of these websites, indicate each station involved and provide an explanation of why the report is not so posted or linked, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided.

Response: The Employment Unit's EEO Public File Reports covering June 1, 2008, through May 31, 2009, and June 1, 2009, through May 31, 2010, are attached as Exhibits 1 and 2, respectively. With respect to any inconsistencies between the information provided in the

¹ For your convenience, all Exhibits are saved as PDFs on the CD filed along with this letter. Please consider the letter and the CD together as the Employment Unit's audit response.

Employment Unit's EEO Public File Reports and the instant response, the information contained herein shall control and, to the best of the Employment Unit's knowledge, is true and correct.

The Unit's most recent EEO Public File Report (covering the period June 1, 2009, through May 31, 2010) is posted to the TV Licensee's website, www.wbaltv.com, and is specifically located at the following URL address:

www.wbaltv.com/download/2011/0601/23753999.pdf

The Report is accessible to website visitors by clicking on the "Contact/About WBAL" link at the bottom of the station's home page and then clicking on the "2009-2010 EEO Public File Report" link.

The same Report is also posted to the Radio Licensee's websites, www.wbal.com and www.98online.com, and is specifically located at the following URL addresses:

www.wbal.com/about/EEO2011.pdf²

www.98online.com/pdf/2009-10_EEO_Public_File_WBALTV,_WBALAM,_WIYYFM.pdf

The Report is accessible to website visitors by clicking on the "Public File" link at the bottom of each of the Radio Licensee's home pages. For each of the three Stations, of course, a new public file report (covering the period June 1, 2010 through May 23, 2011³) will be posted to each Station's website later this month, at which time the specific URL addresses provided above will no longer be functional since the 2010 Report will have been removed from the websites when the 2011 Report is posted.

The following is a list of all positions filled by the Employment Unit during the relevant period and the date on which that position was filled.

2008-2009	
POSITION FILLED	DATE FILLED
Sales Assistant/National – TV	8/4/2008
Promotion Producer – TV	8/4/2008
Account Executive – TV	9/2/2008
Traffic Coordinator – TV	8/4/2008
Account Executive – TV	1/16/2009
Production Manager – TV	10/27/2008

² Notwithstanding the URL address and filename containing the Report on [wbal.com](http://www.wbal.com), which use the numerals "2011," the Report posted is the 2009-2010 Report.

³ WBAL(AM) and WIYY(FM) will each be filing license renewal applications by June 1, 2011, and an accompanying FCC Form 396 report as well. As a result, the 2011 Public File Report will be closed prior to May 31, 2011, and we anticipate closing it out on May 23, 2011.

2008-2009	
POSITION FILLED	DATE FILLED
News Producer – TV	12/9/2008
Account Executive – AM	2/11/2009
Producer – FM	8/18/2008
Account Executive – AM	9/15/2008
Producer – AM	11/1/2008
Engineering Maintenance Technician – AM/FM	10/20/2008

2009-2010	
POSITION FILLED	DATE FILLED
Engineering Technician – TV	9/14/2009
Producer – TV	11/2/2009
Account Executive – TV (2)	12/14/2009 & 1/4/2010
Staff Accountant – TV	2/22/2010
Associate Producer – TV	3/15/2010
Senior Promotions Producer – TV	3/15/2010
Producer – TV	4/1/2010
Account Executive – TV	5/17/2010
Staff Accountant – TV	5/17/2010
Producer/Board Operator – AM	8/21/2009
Program Coordinator – AM/FM	10/12/2009
Account Executive – FM (3)	9/22/2009, 10/5/2009 & 1/4/2010
Talk Show Producer – AM	5/10/2010
Account Executive – AM	4/27/2010

Audit Data Request 3(b). For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in Section 73.2080(c)(5)(iii). Include copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in Section 73.2080(c)(1)(ii).

Response: The Employment Unit filled 29 full-time vacancies during the applicable period. For each job opening, the Employment Unit has attached (as Exhibits 3 through 23) all available copies of advertisements, bulletins, letters, faxes, e-mails, or other communications announcing job openings and all available documentation that such communications were sent to recruitment sources used by the Employment Unit.⁴

⁴ Four positions were not the subject of widespread recruitment because, in each instance, a qualified internal candidate was identified and promoted, obviating the need to engage in
Continued on Page 4

The exhibits attached illustrate that for the period covered by the audit, the Unit had a regular practice of sending vacancy notifications to a variety of sources, which, in the aggregate, are reasonably calculated to reach the Station's entire community.

For clarity, and in anticipation of questions that may arise when the EEO Staff reviews the exhibits, here is some additional context for a few of the vacancies:

First, the June 1, 2009 – May 31, 2010, EEO Public File Report lists, as Job Title ID "K," a position called "Program Coordinator – AM/FM." The materials in Exhibit 20, however, refer to the position as "Continuity/Traffic Coordinator," which may appear to be a mismatch. In fact, the hiree responded to the vacancy notices for the Continuity/Traffic Coordinator position, and, upon his being hired, he requested—and the Radio Licensee obliged his request—to change the job title to Program Coordinator.

Second, the records for a few positions (Exhibits 3, 4, 5) show that the respective vacancy notifications were sent out several days or several weeks after the date the respective vacancy opened. In each of those cases, a vacancy opened and the respective Station took some time to deliberate on whether, in light of the then-current state of the economy and broadcast industry, to fill the opening. In each of those instances, the respective Station ultimately determined that the position should be filled and thereafter sent widespread recruitment notices.

Third, the records for a few positions (Exhibits 8, 9, 20) show that the respective vacancy notifications were sent out several days or weeks *before* the date the respective vacancy officially opened. In each of those cases, an employee either announced his/her intention to leave or the respective Station knew it was going to offer a promotion to an employee, and the Unit began, on *that* date, to recruit for the vacancy, which was not, technically speaking, a vacancy *yet*. With respect to those situations, the Unit considers the date the vacancy opened to be the date when the employee either actually left or was actually promoted.

Finally, the EEO Staff's review of the records in Exhibit 7 for two Account Executive positions (recorded as Job Title IDs "H" and "J" on the June 1, 2008 – May 31, 2009, EEO Public File Report in Exhibit 1) may benefit from further explanation. A similar position was the subject of vacancy notices dated October 2007 that resulted in a hire that was recorded as part of the Unit's June 1, 2007 – May 31, 2008 EEO Public File Report (i.e., the Public File Report that was immediately prior to the two Public File Reports submitted in response to the instant audit). The October 2007 posting for an account executive resulted in a very large number of qualified applicants, and the Unit made the calculated decision to draw again on that impressive applicant pool in order to fill the account executive vacancies in Exhibit 7. In each case, the Radio Licensee conducted a new round of interviews (interviewing 11 and 3 applicants respectively), drawn from the existing applicant pool.

widespread recruitment. Accordingly, there are no corresponding exhibits with this Response that relate to those four positions. The positions are identified below in response to Audit Data Request 3(c).

The following table represents the Employment Unit's Master Recruitment Source List ("MRSL"). When the Unit has an opening, hiring managers review the MRSL and select those sources which they believe will, in the aggregate, be reasonably calculated to reach the Unit's entire community and generate responses from appropriately skilled and qualified professionals. Thus, not all sources on the MRSL would have received vacancy notices for all of the positions that were open during the period of time covered by this audit, and some of the sources listed in the MRSL were not used at all during the period covered by this audit. Please note that sources numbered 32 and 62 on the MRSL have specifically requested notification of job openings, and all vacancy notices were sent to those sources, with the exception of certain vacancies that were filled by internal promotions, for which widespread recruitment was not required.⁵

Recruitment Source Number	Recruitment Source Contact Information	Has Source Requested Vacancy Notification? (Yes/No)
1	602 Communications Graeme Newell 704 543-1426 Gnewell@602Communications.com	N
2	AAMI Broadcasting Training School Mr. Kieth Murphy 2164 Wisconsin Ave., N.W. Washington, DC 20007	N
3	Afro-American Newspapers 2519 N. Charles Street Baltimore, MD 21218 410-554-8200 877-570-9297 (Fax) mgoodwin@afro.com	N
4	AFTRA/SAG Tanya Crumley 4340 East West Highway Suite 204 Bethesda, MD 20814 tcrumley@aftra.com	N
5	Allaccess.com	N
6	American Women in Radio & TV (AWRT) Amy Lortz 7501 Berkshire Rd Baltimore, MD 21224 Awrt.org/members/careerline	N

⁵ See *Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies*, Second Report and Order and Third Notice of Proposed Rule Making, 17 FCC Rcd 24018 (2002), ¶ 103 ("We will not require recruitment for internal promotions . . .").

Recruitment Source Number	Recruitment Source Contact Information	Has Source Requested Vacancy Notification? (Yes/No)
7	Asian American Journalists Association Albert Lee Professional Programs Coordinator 1182 Market St. Suite 320 San Francisco, CA 94102 415-346-2051, x500 post@aaaja.org	N
8	Associated Black Charities dstanley@abc-md.org	N
9	(Same as #6 Above - # Not Used)	
10	BCCC Karen Smedley (2005) Deidre Hill/Job Recruitment (updated 2006) 2901 Liberty Heights Ave Baltimore, MD 21215 ksmedley@bccc.edu dhill@bccc.edu	N
11	Black College Radio bcrmail@blackcollegeradio.com	N
12	Bowie State University Mary Johnson Career Development Center 14000 Jericho Park Rd Bowie, MD 20715	N
13	Broadcasting and Cable Magazine 646-746-6949 Fax 646-746-6954 yatsumi@reedbusiness.com	N
14	Broadcasting Institute of Maryland Norm Brooks Placement Director Baltimore, MD 21234 nb@bim.org	N
15	Career Communications Group gmatison@ccgmag.com	N
16	Careerbuilder.com	N
17	Catholic Charities mcorcora@catholiccharities.com	N
18	CCBC- Essex Campus Continuing Education Department 7201 Rossville Blvd Baltimore, MD 21237 ceed@ccbc.cc.md.us	N

Recruitment Source Number	Recruitment Source Contact Information	Has Source Requested Vacancy Notification? (Yes/No)
19	College of Notre Dame 4701 N Charles Street Baltimore, MD 21210	N
20	Communities Organized to Improve Life Stacey Smith 1200 W Baltimore St Baltimore, MD 21223 410-837-2036	N
21	Community Assistance Network Geraldine Thompson (2005) Hal Malone (2006) 7701 Dunmanway Dundalk, MD 21222 410-285-4674	N
22	Coppin State College Seana Coulter James Thorton 2500 W. North Avenue Baltimore, MD 21216 albowia@coppin.edu 410-383-5855	N
23	Corporate of Public Broadcasting mcrawford@cpb.com	N
24	Dept of Labor, Licensing & Regulation Bernadine Anderson Business Resource Representative 1100 N. Eutaw St. Room 101 Baltimore, MD 21201 banderson@careernet.state.md.us lvass@careernet.state.md.us	N
25	External Referral/Word of Mouth	N
26	Gov. Office of Minority Affairs Ernie Mosby 6 St. Paul Street Baltimore, MD 21202 410-767-8232	N
27	Greater Baltimore Jobs Baltjobs.com 888-818-JOBS	N
28	Greater Baltimore Urban League Sandra Lewis (Via Email) Howard Henderson (Via US Mail) Executive Asst. to President & CEO 512 Orchard St. Baltimore, MD 21202 slewis@bul.org careers@bul.org	N

Recruitment Source Number	Recruitment Source Contact Information	Has Source Requested Vacancy Notification? (Yes/No)
29	HATV Employee Referral	N
30	Hon. Elijah Cummings Office Georgia Jennings-Warmsley District Director Baltimore, MD 21201 Fran.allen@mail.house.gov	N
31	Hotjobs.yahoo.com Hearst Argyle.com	N
32	Howard Univ. School of Communications 525 Bryant St. NW Washington, DC 20059 L_g_brown@howard.edu Cdudley@howard.edu 202-806-7690	Y
33	Inside Radio	N
34	Internal Employee Referral of External candidate	N
35	Internal Posting/ Internal Promotion/Intern Program	N
36	Inventive Marketing LLC info@inventivemarketing.com	N
37	Journalismjobs.com 510-524-2007	N
38	Loyola College Mary DeManss 4501 N. Charles Street Baltimore, MD 21210	N
39	Mayor's Office of Employment Develop Mr. Jesse Rice Workforce Development Specialist Baltimore, MD 21202 knichols@oedworks.com	N
40	McDaniel College Karen Arnie Career Development Center 2 College Hall Westminister, MD 21177	N
41	Md. Comm. On Hispanic Affairs 311 W. Saratoga St. Baltimore, MD 21201 410-767-7857	N
42	Md. Office of Asian Pacific American Affairs 311 W. Saratoga St. Baltimore, MD 21201 410-766-7491	N

Recruitment Source Number	Recruitment Source Contact Information	Has Source Requested Vacancy Notification? (Yes/No)
43	Medialine.com PO Box 51909 Pacific Grove, CA 93950 800-237-8073	N
44	Morgan State University Joseph Barber Center for Career Development C-224 Montebello 1700 E. Cold Spring Lane Baltimore, MD 21251 ccd@moac.morgan.edu 443-885-3110	N
45	N.A.B. Michael McKinley 1771 N. Street, NW Washington, DC 20036	N
46	NAACP Mr. John White 4805 Mt. Hope Drive Baltimore, MD 21215 410-486-4223	N
47	NABJ (National Association of Black Journalists) 8701 Adephe Road Adelphi, MD 20783-1716 310-445-7100	N
48	National Association of Hispanic Journalists Michelle Vignoli Program Assistant 1193 National Press Bldg. Washington, DC 20045 jobbank@nahj.org	N
49	Notre Dame College careercenter@ndm.edu	N
50	Omega Studios 5609 Fishers Lane Rockville, MD 20852 chris@omegastudios.com	N
51	Radio and Record.com	N
52	RTNDA Steve Dunphey 1000 Connecticut Ave., NW Ste. 216 Washington, DC 20036	N

Recruitment Source Number	Recruitment Source Contact Information	Has Source Requested Vacancy Notification? (Yes/No)
53	SBE (Society of Broadcast Engineers) 317-846-9000 Fax: 317-846-9120 Scott Jones Kjones@sbe.org	N
54	Sheffield Audio Visual School Bill Reilly bill@sheffieldav.com	N
55	Spots n' Dots www.selltv@aol.com	N
56	Talent Agent/Agency Referral	N
57	Television Week Erick Chasko 323-370-2415 Fax 323-658-6174 echasko@crain.com	N
58	The Baltimore Sun 410-539-7700 www.baltimoresun.com	N
59	Towson University Mona Martin 8000 York Rd. Enrollment Services Bldg. Towson, MD 21252 mmartin@townso.edu lpearson@towson.edu bmoore@towson.edu www.towson.edu/careercenter 410-830-4814	N
60	TVJobs.com Attn: Mark C Holliday Broadcast Employment Services PO Box 4116 Oceanside, CA 92052 760-754-8177 Fax 760-754-2115	N
61	Unity Conference Washington DC	N
62	University Maryland, BC Executive Administrative Assistant Career Services Center donohue@umbc.edu lpeters@unmb.edu (name change as of 1/7/06)	Y

Recruitment Source Number	Recruitment Source Contact Information	Has Source Requested Vacancy Notification? (Yes/No)
63	University of Baltimore 2530 N Charles Ave Baltimore, MD careercenter@ubmail.ubalt.edu	N
64	Unsolicited – Phone Call, Resume or Application, Word of Mouth	N
65	Station Websites: WBALChannel.com WBAL.com 98Online.com WBALTV.com	N
66	Villa Julie College Ellen Yerman Career Development Office 1525 Greenspring Valley Rd Stevenson, MD 21153	N
67	Rick Gevers & Associates PO Box 577 Zionsville, IN 46077-0577 rick@rickgevers.com	N
68	Media Management Tom Dolan 3 North Court Street Frederick, MD 21701	N
69	TVandRadioJobs.com	N
70	National Organization for Women – Baltimore Chapter PO Box 253 Timonium, MD 21094 info@baltimorenow.org	N
71	Emma L Bowen Foundation for Minority Interest in Media 524 W 57 th Street New York, NY 10019	N
72	Monster.com	N
73	City Paper 410-728-8728 (Fax)	N
74	Urban League www.bul.org	N
75	William Morris Agency 1325 Ave of the Americas New York, NY 10019 212-586-5100	N
76	If Management 810 – 7 th Ave New York, NY 10019 212-265-7711	N
77	Broadcast Cable Financial Management Association (BCFM) www.bcfm.com	N

Recruitment Source Number	Recruitment Source Contact Information	Has Source Requested Vacancy Notification? (Yes/No)
78	DCRTV.com DC/Baltimore area radio/tv/media website www.dcrtv.com	N
79	Traffic Directors Guild of America www.tdga.org	N
80	Jewish Vocational Services 1515 Reisterstown Rd Baltimore, MD 21208 410-653-5760	N

Audit Data Request 3(c). In accordance with Section 73.2080(c)(5)(v), [provide] the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

Response: The total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the applicable period are as follows:

POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
2008-2009		
Sales Assistant/National – TV	9	Internal Posting (2) www.wbaltv.com (4) Urban League (1) Referral (2)
Promotion Producer – TV	5	602 Communications (1) www.wbaltv.com (1) Internal Posting (1) Referral from other HTV stations (2)
Account Executive – TV	9	www.wbaltv.com (5) Client Referral (2) Internal Referral (1) Cold Call (1)
Traffic Coordinator – TV*	1	Internal Candidate (1)
Account Executive – TV*	1	Internal Candidate (1)
Production Manager – TV*	1	Internal Candidate (1)
News Producer – TV	3	Internal Posting (2) www.wbaltv.com (Former employee candidate) (1)

POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Account Executive – AM	11	www.wbal.com (4) External Referral (3) Word of Mouth (1) Internal Referral (3)
Producer – FM*	1	Internal Candidate (1)
Account Executive – AM	4	Cold Call/Word of Mouth (4)
Producer – AM	5	www.wbal.com (1) careerbuilder.com (3) Client Referral (1)
Engineering Maintenance Technician – AM/FM	3	Careerbuilder.com (1) DCRTV.com (1) SBE.org (1)
2009-2010		
Engineering Technician – TV	6	TVJobs.com (6)
Producer – TV	5	www.wbaltv.com (2) TVJobs.com (1) Internal Posting (2)
Account Executive – TV (2)	22 ⁶	Spots ‘n’ Dots (3) Cold Call (3) Internal Employee Referral (5) External Referral (6) Maryland Department of Labor/Workforce Exchange (1) Towson University (1) www.wbaltv.com (2) HATV Employee Referral (1)
Staff Accountant – TV	6	Monster.com (5) Station website (1)
Associate Producer – TV	3	Cold Call (1) Internal Posting (1) Referral (Former Employee) (1)
Senior Promotions Producer – TV	3	www.wbaltv.com (1) 602 Communications (1) HATV Employee Referral (1)
Producer – TV	5	Internal Posting (2) www.wbaltv.com (3)

⁶ The 2009-2010 Public File Report states that there were 24 interviewees, but that was a typographical error. There were 22 interviewees as noted herein.

POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Account Executive – TV	16	Internal Referral (4) External Referral (6) Station website (3) Internal Posting (2) Cold Call (1)
Staff Accountant – TV	7	Station website (4) Internal Referral (1) Towson University (1) Monster.com (1)
Producer/Board Operator – AM	6	www.wbal.com (3) Careerbuilder.com (2) Internal Posting (1)
Program Coordinator – AM/FM (f/k/a Continuity/Traffic Coordinator)	7	www.wbal.com (1) Internal Referral (2) Careerbuilder.com (4)
Account Executive – FM (3)	28	www.98online.com (5) Internal Referral (5) External Referral (3) Morgan State University (1) Careerbuilder.com (10) Monster.com (2)
Talk Show Producer – AM	9	External Referral (3) Towson University (1) Internal Posting (3) www.wbal.com (2)
Account Executive – AM	15	Careerbuilder.com (11) www.wbal.com (4)

* These positions were not the subject of widespread recruitment because, in each instance, a qualified internal candidate was identified and promoted, obviating the need to engage in widespread recruitment. Accordingly, there are no corresponding exhibits with this Response that relate to these four positions.

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Audit Data Request 3(d). Documentation of Unit recruitment initiatives described in Section 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to Sections 73.2080(c)(2) and (e)(3).

Response: The total number of full-time employees of the Employment Unit varies over time. The total number of full-time employees in the Employment Unit as of April 15, 2011, was 208 (143 for the TV Licensee and 65 for the Radio Licensee). The Employment Unit's Market has more than 250,000 people. Thus, by the Employment Unit's calculation, the Employment Unit is required to perform four (4) initiatives in each applicable two-year period.

During the period of time covered by the two most recent EEO Public File Reports, the Employment Unit engaged in numerous recruitment initiatives described under Section 73.2080(c)(2) and in the Public File Reports. The Unit has attached, as Exhibits 24 through 28, illustrative documentation demonstrating performance of and participation in the recruitment initiatives listed in the tables below. As set forth in the Public File Reports, the Stations engaged in additional outreach activities as well.

Participation in Job Fairs (47 C.F.R. § 73.2080(c)(2)(i)) Exhibit 24	
<i>Activity</i>	<i>Personnel Involved</i>
Congressman Elijah Cummings / NAACP Joint Employment Fair 2009 and 2010 Job Fairs March 30, 2009 & April 19, 2010	Wanda Draper, Director of Programming/Public Service, WBAL-TV Arthur Hawkins, Sales Manager, WBAL Hugues Jean, GSM, WIYY
2008 Communications Job Fair Howard University October 23-24, 2008	Wanda Draper, Director of Programming/Public Service, WBAL-TV Arthur Hawkins, Sales Manager, WBAL Hugues Jean, GSM, WIYY
Career Fair Loyola College March 25, 2009	Wanda Draper, Director of Programming/Public Service, WBAL-TV Arthur Hawkins, Sales Manager, WBAL Hugues Jean, GSM, WIYY
Part Time and Summer Job Fair Towson University April 6, 2009	Wanda Draper, Director of Programming/Public Service, WBAL-TV Justina Pollard, Internship Coordinator, WBAL-TV
"Just In Time" Career and Internship Fair Towson University April 21, 2009	Arthur Hawkins, Sales Manager, WBAL Hugues Jean, GSM, WIYY

Participation in Job Fairs (47 C.F.R. § 73.2080(c)(2)(i)) Exhibit 24	
<i>Activity</i>	<i>Personnel Involved</i>
2010 Career Fair Loyola College of Maryland March 22, 2010	Wanda Draper, Director of Programming/Public Service, WBAL-TV Kathleen Taylor, WIYY Account Executive Jim Riley, WBAL Account Executive
Career and Internship Fair Morgan State University April 15, 2010	Wanda Draper, Director of Programming/Public Service, WBAL-TV Arthur Hawkins, Sales Manager, WBAL Hugues Jean, GSM, WIYY
Coppin State University Career Fair April 19, 2010	Wanda Draper, Director of Programming/Public Service, WBAL-TV Arthur Hawkins, Sales Manager, WBAL Hugues Jean, GSM, WIYY

Participation in at Least Four Events Sponsored By Organizations Representing Groups Present in the Community Interested in Broadcast Employment Issues, Including Conventions, Career Days, Workshops, and Similar Activities (47 C.F.R. § 73.2080(c)(2)(iv)) Exhibit 25	
<i>Activity</i>	<i>Personnel Involved</i>
College of Journalism Career Fair University of Maryland, College Park October 20, 2008	Scott Wykoff, News Reporter
Congressman Elijah Cummings Teen Summit Career Day February 16, 2009	Stan Stovall, Anchor
Mock Interviews/Career Day New Town High School November 19-20, 2009	Wanda Draper, Director of Programming/Public Service, WBAL-TV Hugues Jean, GSM, WIYY
Phi Beta Lambda Student Club Internship and Mock Interview Day November 4, 2009	Wanda Draper, Director of Programming/Public Service, WBAL-TV

**Participation in at Least Four Events Sponsored By
Organizations Representing Groups Present in the Community
Interested in Broadcast Employment Issues, Including
Conventions, Career Days, Workshops, and Similar Activities
(47 C.F.R. § 73.2080(c)(2)(iv))**

Exhibit 25

<i>Activity</i>	<i>Personnel Involved</i>
New Shiloh Baptist Church Career Workshop for Debutantes October 24, 2009	Lisa Robinson, News Anchor/Reporter

**Internship Program
(47 C.F.R. § 73.2080(c)(2)(v))**

Exhibit 26

<i>Activity</i>	<i>Personnel Involved</i>
2008-2009 & 2009-2010: During the two reporting periods covered by the public file reports, each of the Stations comprising the Employment Unit sponsored an internship program with positions in various departments, which taught skills for college students enrolled in broadcasting-related courses of study. In the aggregate, the Stations hosted dozens of interns during the two-year period.	Station Department Heads and other supervising personnel

**Participation in Programs Sponsored by Educational
Institutions Relating to Careers in Broadcasting
(47 C.F.R. § 73.2080(c)(2)(x))**

Exhibit 27

<i>Activity</i>	<i>Personnel Involved</i>
Guest Lecturer for Catonsville Community College Marketing Class April 30, 2009	Jordan Wertlieb, then-President & GM
Guest Lecturer for Goucher College Communications Class April 25, 2009	Katherine Dietrich, Senior Account Executive

**Participation in Programs Sponsored by Educational
Institutions Relating to Careers in Broadcasting
(47 C.F.R. § 73.2080(c)(2)(x))
Exhibit 27**

<i>Activity</i>	<i>Personnel Involved</i>
Guest Lecturer for Dr. Richard Vatz's Media Criticism Class at Towson Univ. September 21, 2008 March 26, 2009 November 3, 2009 April 27, 2010	Mark Miller, News Director
Guest Lecturer for Audio Production Class at McDaniel College April 22, 2009	Scott Wykoff, Reporter
Guest Lecturer for Broadcast Writing and Reporting Class at George Washington Univ. Media and Public Affairs School March 23, 2009	Scott Wykoff, Anchor/Reporter
Speaking Engagement, Broadcasting Class, Towson University December 4, 2008	Mark Miller, News Director
Leadership Carroll Media Day Carroll Community College April 14, 2009	Wanda Draper, Director of Programming/Public Service, WBAL-TV
Phillip Merrill College of Journalism Career and Internship Fair University of Maryland, College Park October 19, 2009	John Patti, WBAL(AM) Reporter/Anchor
Guest Lecturer for Media Sales Class Towson University March 29, 2010	Anthony Arbucias, Local Sales Manager WBAL- TV
Guest Lecturer at Goucher College's Graduate Program in Broadcasting April 14, 2010	Wanda Draper, Director of Programming/Public Service, WBAL-TV

Participation in Programs Sponsored by Educational Institutions Relating to Careers in Broadcasting (47 C.F.R. § 73.2080(c)(2)(x)) Exhibit 27	
<i>Activity</i>	<i>Personnel Involved</i>
Guest Lecturer for Electronic Media Management Class Morgan State University September 16, 2009	Hugues Jean, GSM WIYY

Listing of Each Upper Level Category Opening with Media Trade Groups whose Membership Includes Substantial Participation by Women and Minorities (47 C.F.R. § 73.2080(c)(2)(xii)) No Separate Exhibit—Documentation Included in Exhibits 3-23	
<i>Activity</i>	<i>Personnel Involved</i>
2008-2009 & 2009-2010: During the periods covered by the two Public File Reports attached to this response, upper level positions were posted with AWRT (now known as AWM), Afro-American Newspapers, Asian American Journalists Association, National Association of Black Journalists, National Association of Hispanic Journalists and others.	Station Employment Unit

Training to Management Level Personnel (47 C.F.R. § 73.2080(c)(2)(xiv)) Exhibit 28	
<i>Activity</i>	<i>Personnel Involved</i>
Attendance at EEO Online Seminar May 11, 2010	Sue Nuñez, Director of Finance – East Region (formerly the Unit's Controller)

Audit Data Request 3(e). Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex.

For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

Response: To the best of the Radio Licensee's knowledge, there have been no pending or resolved complaints against the Radio Licensee alleging unlawful discrimination in the Unit's employment practices during the current License term, which commenced on October 1, 2003.

With respect to the TV Licensee, a complaint was filed against WBAL-TV, in or around August 2005. John Casey Clark, Jr. filed a charge of discrimination with the Maryland Commission on Human Relations, alleging retaliation. This charge was apparently forwarded to the U.S. EEOC in or around September 2005, and WBAL-TV received a Notice of Charge of Discrimination in which the circumstances of discrimination were described as retaliation (Charge No. 120-2005-05250C). On or around December 14, 2005, the U.S. EEOC issued a Dismissal and Notice of Rights, stating: "Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes."

The TV Licensee is not aware of any other pending or resolved complaints against the TV Licensee during the current license term.

Audit Data Request 3(f). *In accordance with Section 73.2080(b), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date), until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.*

Response: *Enforcement of EEO Policies.* Each of the Stations in the Unit has three levels of management to ensure enforcement of Employment Unit EEO policies: a General Manager, Department Heads, and supervising managers. Each level of management has significant input into the hiring, training, disciplining, terminating, and daily supervision of station employees. Additionally, the Unit's corporate parent's Director of Finance – East Region⁷ (who was formerly the resident Controller for the Unit) and each General Manager's Administrative Assistant are actively involved in the Employment Unit's EEO program.

⁷ The Director of Finance – East Region formerly held the title of Resident Controller for the Employment Unit. In her capacity as the corporate parent's Director of Finance – East Region, she remains physically located in Baltimore in the Stations' building and, as such, remains actively involved in oversight and enforcement of the Unit's EEO policies, program, and procedures.

Management at the Employment Unit has taken steps to monitor and enforce the Employment Unit's EEO policies on a continuing basis. At the time the Commission's new EEO rules were implemented in March 2003, a legal EEO "primer" was distributed to each Department Head and Supervising Manager, and key station personnel attended training provided by the Maryland/District of Columbia/Delaware Broadcasters Association. The "primer" was redistributed in November 2010. Additionally, at the time of their implementation, the then-new rules were reviewed and discussed by the then-General Manager during meetings with Department Heads and Supervising Managers. The undersigned President and General Manager of WBAL-TV and the TV Licensee is of relatively recent vintage to the Unit, and, as such, he took the opportunity to review the Unit's EEO policies and procedures shortly after his appointment to the position in January 2011.

When necessary, the General Managers and Department Managers use a portion of their weekly meetings to reinforce EEO policies and EEO program issues including issues related to the hiring process. When Unit management has convened annual off-site Strategic Planning Retreats, the topics addressed have included, among other things, human resources issues, EEO compliance, and employment outreach initiatives. As reflected in the Unit's 2005 EEO audit response, during the 2005 Strategic Planning Retreat, the then-new Controller specifically addressed EEO recordkeeping and identified strategies designed to improve recordkeeping practices.

Employment Unit management also helps ensure EEO program and policy enforcement by actively engaging in both the recruitment/hiring process and the Employment Unit's outreach initiatives. The General Manager and relevant Department Head and Supervising Manager conducting the recruitment for a particular position discuss the job responsibilities, the qualifications required, and the recruiting sources to be used to fill the position. Department Heads and the Director of Finance – East Region (formerly the Controller) then monitor the interview and recruitment process to ensure the Unit's EEO policies have been followed.

For the Employment Unit's outreach initiatives, the Director of Programming for WBAL-TV and the Administrative Assistant for the Radio Stations are charged with collecting outreach activity documentation for forwarding to the Director of Finance – East Region (formerly the Unit's Controller). Outreach activities are often discussed and approved during the weekly Department Head meetings. In addition, the Unit has a policy of actively encouraging station personnel to participate in the types of community and other activities that qualify as EEO outreach activities, whether or not the Unit ultimately takes "credit" for such participation. Participation in such events and activities is another way that the Stations provide service to the public in the greater Baltimore area.

Unit's Efforts to Inform Employees and Applicants of EEO Policies and Program. The Employment Unit maintains a handbook containing the Employment Unit's three-page Harassment Policy, which includes, among other things, a "plain language" definition of harassment and a procedure for employees to follow to report incidents involving harassment, discrimination or retaliation. The handbook also includes a specific statement relating to EEO, which states as follows:

It is the policy of the Company to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, citizenship, marital status, sexual orientation or any other characteristic protected by law. The Company prohibits and will not tolerate any such discrimination or harassment.

The handbook also contains an Americans with Disabilities Policy that prohibits certain disability-based discrimination. Each manager and employee must sign forms stating that they have received and reviewed the copy of the handbook. The Employment Unit's anti-discrimination policy also is posted on central Station bulletin boards.

In addition (and as discussed again below in response to the audit question relating to union cooperation), for station employees that are members of one of the three unions present at the Stations, the following language appears in their respective collective bargaining agreement:

The IBEW agreement states: "The Company is an equal opportunity employer. Neither the Company, the Union, or its member Technicians shall discriminate against any Employee or applicant for employment because of race, sex, creed, color, national origin, veteran's status, or age (40 and over) (except where age or sex is a bona fide occupational qualification) and as required by state, federal and local law. In this contract, the grammatical usage of the masculine gender or feminine gender shall refer equally to either gender."

The DGA agreement states: "Both parties hereto affirm their intentions to continue to adhere to and support a policy which affords equal opportunity to qualified individuals regardless of their race, creed, color, national origin, age or sex."

The AFTRA agreement states: "The Company is an equal opportunity employer. Neither the Company, the Union, nor its members shall discriminate against any employee or applicant for employment because of race, sex, creed, color, religion, national origin, veteran's status or age. Both parties hereto affirm a policy which affords equal opportunity to all qualified individuals."

Each of the Unit's Stations' websites, www.WBALTV.com, www.wbal.com, www.98online.com, contains a section relating to that Station's employment opportunities. When a potential applicant clicks on the appropriate hyperlink, they are taken to the respective Station's parent company's Hearst Television Careers website, which prominently features a link titled "Equal Opportunity Policy." By clicking on that link, potential applicants will see the Company's EEO policy, which is as follows:

Hearst Television believes that its most valuable resources are the men and women who work for the Company, and the professional growth these individuals can achieve. We believe in equal employment opportunities regardless of race, color, religion, sex, national origin, age, sexual orientation, disability or any other legally protected classification. It is our policy to hire and promote the most qualified applicant to comply with all federal, state and local equal opportunity laws. Hearst Television also is

committed to maintaining a work environment free of all forms of employee discrimination and/or harassment.

In addition, in or around 2006, the Employment Unit's parent company, Hearst Television Inc., implemented at its stations (including the three stations subject to this audit) an online training course concerning the recognition and prevention of workplace sexual harassment; thus, the Employment Unit began implementing the training in mid-2006. All employees are required to complete this course irrespective of when they were or are hired.

For job applicants, the Employment Unit generally includes on vacancy recruitment notices a statement referencing its equal opportunity and nondiscrimination policies. The precise content of such statements depends on the precise nature of the notice and the media in which it is posted. By way of example, many Unit vacancy notices state:

WBAL-TV/WBAL-AM/WIYY-FM is an equal opportunity employer and does not discriminate in the hiring, training, or promotion of employees by reason of race, color, religion, sex, or national origin. We are engaged in a continuing effort to seek out prospective applicants for employment with our company. We earnestly solicit your assistance in obtaining employees and request that you refer prospective applicants to us at the address below.

In other cases, a vacancy notice might simply state: "EOE" if the space constraints for the ad so dictate.

In addition, the Employment Unit's job application contains a statement as follows:

It is the policy of this station not to discriminate in its employment and personnel practices because of a person's race, color, creed, religion, sex, sexual orientation, national origin, disability or age. Discriminatory employment practices are specifically prohibited by the Federal Communications Commission. If you believe your equal employment rights have been violated, you may contact the FCC in Washington DC 20554, or other appropriate state or local agency.

Thus, in the aggregate, the Station educates, at numerous points and through various means, its employees and applicants about its non-discrimination and equal opportunity policies.

***Audit Data Request 3(g).** In accordance with Section 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.*

Response: This same Employment Unit was the subject of a random Commission EEO audit in 2005,⁸ which created an opportunity for the Unit to evaluate and analyze its recruitment program, and, as referenced in the Unit's 2005 response, certain steps were taken at that time to improve certain aspects of the recruitment program. The Employment Unit continually monitors and analyzes its EEO recruitment program. The Director of Finance – East Region (formerly the Unit's Controller) tracks the Unit's EEO activities and recruitment and reports the information to the respective General Manager and to the Unit's corporate parent on a monthly basis. The Unit adds new sources and contact information as warranted and attempts to cull out unproductive recruitment sources—however, the Unit, in an effort to be sure to continue to reach the Unit's entire community with recruitment notices, errs on the side of caution by continuing to use even unproductive sources. Of course, the goal of the Unit's recruitment process has two principal prongs: first, to provide notification to recruitment sources such that the outreach is reasonably calculated to reach the entire community and second, to provide notification to recruitment sources that are reasonably expected to result in reaching qualified applicants, particularly when a position requires more specialized skills and qualifications. The sources used for each vacancy are selected by the relevant hiring manager and Department Heads, in consultation with the Director of Finance – East Region. Thus, recruitment outreach is discussed at the time of every vacancy and recruitment for each vacancy is executed in a manner that attempts to target qualified potential applicants.

In addition, in the last several months, when the job functions associated with the posting of vacancy notices were centralized in the Unit's parent company's service center, the Stations undertook, in connection with representatives of their parent company, a careful and deliberate evaluation of the recruitment sources currently used by the Unit.⁹ Finally, as noted above, with respect to the TV Licensee, a new General Manager was named for WBAL-TV in January 2011,¹⁰ and he—who is one of the undersigned—has undertaken a review and evaluation of the Unit's EEO recruitment program since being appointed to the position.

Audit Data Request 3(h). *In accordance with Section 73.2080(c)(4), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to*

⁸ Following the 2005 audit, the Unit received correspondence from you dated December 7, 2005, indicating that no apparent violations were found.

⁹ To be clear, the Unit's EEO program and policies will continue to be overseen and administered locally by the Unit. Only the physical function of actually sending out vacancy notices was centralized in the service center.

¹⁰ Although the General Manager vacancy did not occur during a period covered by either of the EEO Public File Reports included with this audit, it bears mentioning that the General Manager position was filled by internal promotion of a Company employee.

ensure that they provide equal opportunity and do not have a discriminatory effect. If the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

Response: *Compensation and Benefit Levels.* The Employment Unit's compensation levels are reviewed on an annual basis during budget preparation by the General Managers, the Department Managers, and the Director of Finance – East Region to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect. The compensation levels also are reviewed with corporate managers of parent company Hearst Television Inc. and are compared to national and regional industry compensation reports. There have also been occasions when compensation comparisons have been discussed with local and union attorneys to ensure equal and non-discriminatory effects among contracted employees. The regional and national salary data for particular positions are then compared to the salaries of the Employment Unit's employees in those same positions. Compensation and benefits are also reviewed during annual employee evaluations for those employees who receive such evaluations. Compensation may be increased for myriad reasons, including merit, fairness, and to ensure that rates of pay are non-discriminatory. Of course, for Unit employees subject to the collective bargaining agreements, compensation and benefits increases are determined by the respective union agreement.

Seniority Practices and Promotions. The Department Heads and/or Supervising Managers conduct annual written and/or oral performance appraisals for each employee. Internal promotions are based upon the availability of open positions and the results of the performance appraisals and discussions between the relevant General Manager and the appropriate Department Head (whom, as noted above, have responsibility for enforcing the Unit's EEO program and policy).

Selection Techniques. After providing notices of job vacancies to a wide and diverse array of educational institutions, professional and non-profit organizations, and internet resources, the selection process is based upon the experience, qualifications, and talents of the candidates. The relevant General Manager and Department Head (and, if appropriate, the Supervising Manager) consult on each selection.

Union Cooperation. The Employment Unit has collective bargaining agreements with three labor unions, (i) Local 1200 of the International Brotherhood of Electrical Workers ("IBEW"), (ii) Directors Guild of America, Inc. ("DGA"), and (iii) American Federation of Television and Radio Artists Washington-Baltimore Local ("AFTRA"). Each of those collective bargaining agreements contains language regarding equal opportunity employment.

The IBEW agreement states: "The Company is an equal opportunity employer. Neither the Company, the Union, nor its member Technicians shall discriminate against any Employee or applicant for employment because of race, sex, creed, color, national origin, veteran's status, or age (40 and over) (except where age or sex is a bona fide occupational qualification) and as required by state, federal and local law. In this contract, the grammatical usage of the masculine gender or feminine gender shall refer equally to either gender."

The DGA agreement states: "Both parties hereto affirm their intentions to continue to adhere to and support a policy which affords equal opportunity to qualified individuals regardless of their race, creed, color, national origin, age or sex."

The AFTRA agreement states: "The Company is an equal opportunity employer. Neither the Company, the Union, nor its members shall discriminate against any employee or applicant for employment because of race, sex, creed, color, religion, national origin, veteran's status or age. Both parties hereto affirm a policy which affords equal opportunity to all qualified individuals."

Union members may use the grievance procedures set forth in the respective collective bargaining agreement to enforce the equal opportunities provisions. In any event, the Unit and respective station would cooperate fully with the respective union in the event a discrimination issue arose with respect to a covered union member.

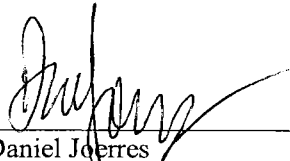
The remaining audit data requested are not applicable because neither the TV Licensee nor the Radio Licensee is a religious broadcaster, and none of the Stations in the Employment Unit is brokered by another company.

Each of the Stations in the Unit is placing a copy of this letter and the attached Exhibits in its respective Public Inspection File.

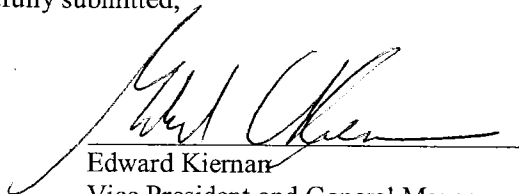
If you have any questions regarding this response or need any further information, please call our attorney Stephen Hartzell at (919) 839-0300.

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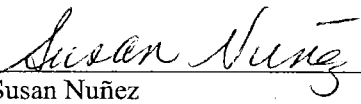
Respectfully submitted,



Daniel Joerres
President and General Manager
WBAL Hearst Television Inc.
Licensee of WBAL-TV



Edward Kiernan
Vice President and General Manager
Hearst Stations Inc.
Licensee of WBAL(AM) and WIYY(FM)



Susan Nuñez
Director of Finance – East Region
Hearst Television Inc.

**WBAL Hearst Television Inc. & Hearst Stations Inc.
WBAL-TV, WBAL(AM), WIYY(FM)
Response to March 29, 2011, EEO Audit Letter**

EXHIBIT LIST

Exhibit 1	EEO Public File Report (June 1, 2008 – May 31, 2009)
Exhibit 2	EEO Public File Report (June 1, 2009 – May 31, 2010)
Exhibit 3	Copies of advertisements or other communications announcing job vacancy for the position of Sales Assistant/National (filled August 4, 2008)
Exhibit 4	Copies of advertisements or other communications announcing job vacancy for the position of Promotion Producer (filled August 4, 2008)
Exhibit 5	Copies of advertisements or other communications announcing job vacancy for the position of Account Executive (filled September 2, 2008)
Exhibit 6	Copies of advertisements or other communications announcing job vacancy for the position of News Producer (filled December 9, 2008)
Exhibit 7	Copies of advertisements or other communications announcing job vacancy for the position of Account Executive (2 positions) (filled February 11, 2009 & September 15, 2008)
Exhibit 8	Copies of advertisements or other communications announcing job vacancy for the position of Producer (filled November 1, 2008)
Exhibit 9	Copies of advertisements or other communications announcing job vacancy for the position of Engineering Maintenance Technician (filled October 20, 2008)
Exhibit 10	Copies of advertisements or other communications announcing job vacancy for the position of Engineering Technician (filled September 14, 2009)
Exhibit 11	Copies of advertisements or other communications announcing job vacancy for the position of Producer (filled November 2, 2009)
Exhibit 12	Copies of advertisements or other communications announcing job vacancy for the position of Account Executive (2 positions) (filled December 14, 2009 & January 4, 2010)
Exhibit 13	Copies of advertisements or other communications announcing job vacancy for the position of Staff Accountant (filled February 22, 2010)
Exhibit 14	Copies of advertisements or other communications announcing job vacancy for the position of Associate Producer (filled March 15, 2010)
Exhibit 15	Copies of advertisements or other communications announcing job vacancy for the position of Senior Promotions Producer (filled March 15, 2010)
Exhibit 16	Copies of advertisements or other communications announcing job vacancy for the position of Producer (filled September 20, 2010)
Exhibit 17	Copies of advertisements or other communications announcing job vacancy for the position of Account Executive (filled May 17, 2010)
Exhibit 18	Copies of advertisements or other communications announcing job vacancy for the position of Staff Accountant (filled May 17, 2010)
Exhibit 19	Copies of advertisements or other communications announcing job vacancy for the position of Producer/Board Operator (filled August 21, 2009)

Exhibit 20	Copies of advertisements or other communications announcing job vacancy for the position of Program Coordinator (f/k/a Continuity/Traffic Coordinator) (filled October 12, 2009)
Exhibit 21	Copies of advertisements or other communications announcing job vacancy for the position of Account Executive (3 positions) (filled September 22, 2009, October 5, 2009 & January 4, 2010)
Exhibit 22	Copies of advertisements or other communications announcing job vacancy for the position of Talk Show Producer (filled May 10, 2010)
Exhibit 23	Copies of advertisements or other communications announcing job vacancy for the position of Account Executive (filled April 27, 2010)
Exhibit 24	Documentation demonstrating participation in job fairs by Employment Unit personnel who have substantial responsibility in making hiring decisions
Exhibit 25	Participation in events sponsored by organizations representing groups present in the community interested in broadcast employment issues
Exhibit 26	Documentation demonstrating establishment of an internship program designed to assist members of the community to acquire skills needed for broadcast employment
Exhibit 27	Documentation demonstrating participation in programs sponsored by educational institutions relating to careers in broadcasting
Exhibit 28	Documentation demonstrating participation in training for management level personnel